

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division**

JOSEPH R. ERNST,

Plaintiff,

v.

CIVIL NO. 3:11-cv-625

**EXPERIAN INFORMATION SOLUTIONS, INC.,
TRANS UNION, LLC, WACHOVIA MORTGAGE,
a Division of WELLS FARGO BANK, N.A.,**

Defendants.

MOTION FOR MODIFICATION OF SCHEDULING ORDER

Comes now the Plaintiff, by counsel, and with the consent of Wachovia Mortgage/Wells Fargo Bank, N.A., moves for modification of the court's scheduling order (Docket # 13, 20) so that the deadline for Plaintiff's expert disclosures shall be enlarged until January 24, 2012. The Plaintiff respectfully requests a proportionate enlargement for the Defendants to identify their experts to be February 24, 2012, or such an enlargement as the court deems proper for all parties to designate their experts.

Therefore, the Plaintiff respectfully requests that the court grant his motion to modify the scheduling order and enlarge the time in which the parties must identify expert witnesses.

JOSEPH R. ERNST

/s/

Susan M. Rotkis
VSB 40693
Attorney for Plaintiff
CONSUMER LITIGATION ASSOC., P.C.
763 J. Clyde Morris Boulevard, Suite 1-A

Newport News, Virginia 23601
(757) 930-3660 - Telephone
(757) 930-3662 – Facsimile
srotkis@clalegal.com

Leonard A. Bennett, Esq.
VSB #37523
Attorney for Plaintiff
CONSUMER LITIGATION
ASSOCIATES, P.C.
763 J. Clyde Morris Boulevard, Suite 1-A
Newport News, Virginia 23601
(757) 930-3660 - Telephone
(757) 930-3662 – Facsimile
lenbennett@cox.net

Kristi Cahoon Kelly, VSB #72791
SUROVELL ISAACS PETERSEN &
LEVY PLC
4010 University Drive, 2nd Floor
Fairfax, VA 22030
Telephone (703) 277-9774
Facsimile (703) 591-9285
kkelly@sipfirm.com

Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on this 12th day of December, 2011, I will electronically file the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) to the following:

David Neal Anthony
Troutman Sanders LLP
Troutman Sanders Bldg
1001 Haxall Point
PO Box 1122
Richmond, VA 23219
Email: david.anthony@troutmansanders.com

Timothy James St. George
Troutman Sanders LLP
Troutman Sanders Bldg

1001 Haxall Point
PO Box 1122
Richmond, VA 23219
Email: tim.stgeorge@troutmansanders.com

Paul Lee Myers
Strasburger & Price, LLP
2801 Network Boulevard
Suite 600
Frisco, TX 75034
Email: paul.myers@straasburger.com

Attorneys for Experian Information Solutions, Inc.

Grant Edward Kronenberg
Morris & Morris PC
11 South 12th Street
5th Floor
PO Box 30
Richmond, VA 23218
Email: gkronenberg@morrismorris.com

Attorneys for Trans Union, LLC

Hunter Wilmer Sims, Jr.
Kaufman & Canoles PC
150 W Main St
PO Box 3037
Norfolk, VA 23510
Email: hwsims@kaufcan.com

Terry Catherine Frank
Kaufman & Canoles PC (Richmond)
1021 E Cary St Suite 1400
Two James Center
PO Box 27828
Richmond, VA 23261
Email: tcfrank@kaufcan.com

Attorneys for Wachovia

/s/
Susan M. Rotkis
Attorney for Plaintiff
CONSUMER LITIGATION ASSOC., P.C.
763 J. Clyde Morris Boulevard, Suite 1-A
Newport News, Virginia 23601